

UNITED STATES OF AMERICA )

v. )

Manning, Bradley E. )  
PFC, U.S. Army, )  
HHC, U.S. Army Garrison, )  
Joint Base Myer-Henderson Hall )  
Fort Myer, Virginia 22211 )

STIPULATION OF  
EXPECTED TESTIMONY

(b) (6)

DATED: 10 May 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if (b) (6) were present to testify during the merits and pre-sentencing phases of this court-martial, she would testify substantially as follows.


1. I, (b) (6), previously of the surname (b) (6), am the Officer-in-Charge (OIC) of the S-2 section at the 305th Military Intelligence Battalion, Fort Huachuca, Arizona. I have held this position since 2009. As the OIC, I am responsible for security oversight, including those security measures necessary for the in- and out-processing of Advanced Individual Training (AIT) students at the United States Army Intelligence Center and School.
2. Before becoming the OIC of the S-2 section, I was a security specialist in the S-2 section for nearly 15 years. I was the lead for the enlisted section of AIT students and was responsible for processing clearance paperwork, tracking the status of security clearances, and providing the security brief to incoming and outgoing AIT students.
3. All AIT students were required to have a SECRET security clearance to attend AIT. I was responsible for confirming that the AIT students possess the necessary security clearance through the Joint Personnel Adjudication System (JPAS). If any student did not possess a SECRET security clearance, I would process the security clearance, which would include having the student complete a Standard Form (SF) 86. Some Military Occupational Specialties (MOS) required that the student possess a TOP SECRET security clearance in order to graduate AIT, and I would assist those students with processing their TOP SECRET security clearances. PFC Bradley Manning is a 35F (previously 96B) (All-Source Intelligence Analyst), an MOS that required PFC Bradley Manning to possess a TOP SECRET security clearance in order to graduate from AIT.
4. PFC Bradley Manning attended AIT from 4 April 2008 until 14 August 2008, during which time I was a security specialist in the G-2 section. At 0800 on Monday, 7 April 2008, I gave all students, including PFC Manning, a security brief which lasted approximately forty-five minutes. I briefed the class, including PFC Manning, on Operational Security (OPSEC) and Information Systems Security (INFOSEC). Specifically, I briefed that OPSEC is the process of denying adversaries information about friendly capabilities and intentions by identifying, controlling, and protecting indicators associated with the planning and conducting of military operations and other activities. Specifically, I briefed that INFOSEC is the system of policies, procedures, and requirements established under the authority of Executive Order 13526 to protect information that, if subjected to unauthorized disclosure, could reasonably be expected to cause damage to the national security. I briefed the class, including PFC Manning, about the dangers to national


security of allowing U.S. Army and government classified information on the Internet. I explained to the class, including PFC Manning, that putting information on the Internet not only exposes information relating to our national security, but also puts each Soldier at-risk of blackmail by our adversaries given his position of trust to safeguard classified information. During my brief, I discussed previous cases of treason, to include John Walker Lindh and Aldrich Hazen Ames, to teach PFC Manning and the rest of the class the consequences of violating this position of trust and betraying his country.

5. At the conclusion of my security brief, I explained to the class and PFC Manning the purpose and contents of the Standard Form (SF) 312 - Nondisclosure Agreement (NDA). I then asked the class and PFC Manning if they wanted to voluntarily sign the NDA. PFC Manning volunteered to sign the NDA. I then instructed PFC Manning and those others who signed the NDA to stand up, raise their right hand, and state that they accepted the responsibilities contained within the NDA and voluntarily agreed to be bound to the terms within the NDA. Afterwards, PFC Manning completed and voluntarily signed the NDA, for which I co-signed as a witness to PFC Manning's signature.

6. The NDA with BATES # 00022912-00022913 is the NDA which PFC Manning executed on 7 April 2008. The same document is the NDA which I then witnessed PFC Manning sign. I recognize my signature on that specific NDA and I, along with each student for which I co-signed as a witness, followed the above described procedures each time the student executed a NDA.

  
J. HUNTER WHYTE  
CPT, JA  
Assistant Trial Counsel

  
THOMAS F. HURLEY  
MAJ, JA  
Military Defense Counsel

  
BRADLEY E. MANNING  
PFC, USA  
Accused